

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

JACQUELINE BEAL,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 1:20cv00862-CMH-TCB
)	
LIFE INSURANCE COMPANY)	
OF NORTH AMERICA,)	
)	
Defendant.)	

DEFENDANT'S NOTICE OF MOTION TO SEAL

PLEASE TAKE NOTICE that Defendant Life Insurance Company of North America ("LINA"), by counsel, and pursuant to Rule 5.2 of the Federal Rules of Civil Procedure, Rule 5 of the Local Rules for the United States District Court for the Eastern District of Virginia, and the United States District Court for the Eastern District of Virginia's Electronic Case Filing (E-Filing) Policies and Procedures, has moved this Court to seal the administrative record in this case in order to prevent public disclosure of personal data identifiers and other confidential information contained in the administrative record. The reasons for this motion are more fully explained in the non-confidential memorandum accompanying LINA's Motion to Seal.

Before this Court may seal documents, it must: (1) provide public notice with an opportunity to object; (2) consider less drastic alternatives; and (3) state specific findings in support of a decision to seal and reject alternatives to sealing. *See, e.g., Flexible Benefits Council v. Feltman*, No. 1:08-CV-371, 2008 U.S. Dist. LEXIS 93039 (E.D. Va. Nov. 13, 2008) (citing *Ashcraft v. Conoco, Inc.*, 218 F.3d 282, 288 (4th Cir. 2000)).

In compliance with Local Rule 5 of the Rules of this Court and *Ashcraft*, the following notice is provided to the public: “This serves as public notice that Unum has moved to file under seal the administrative record in this case. Objections to this Motion should be filed in the Civil Section of the Clerk’s Office within seven (7) days after the filing of the motion to seal and if no objection is filed in a timely manner, the Court may treat the motion as uncontested.”

LIFE INSURANCE COMPANY OF
NORTH AMERICA

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CERTIFICATE OF SERVICE

I hereby certify that on this 30th day of April, 2021, a true and accurate copy of the foregoing documents was filed electronically with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following CM/ECF participants:

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